

JOSEPH & KIRSCHENBAUM LLP

Attorneys at Law

Charles Joseph  
D. Maimon Kirschenbaum  
Denise Schulman  
Josef Nussbaum  
Lucas C. Buzzard  
Michael DiGiulio  
Leah Seliger

32 Broadway, Suite 601  
New York, NY 10004  
Phone (212) 688-5640  
Fax (212) 688-2548  
www.jk-llp.com

August 30, 2024

**VIA ECF**

Honorable Peggy Kuo  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Buscaino v. Dircksen & Talleyrand, Inc. d/b/a/ River Café and Ariel Echevarria (22 cv 7572)(AMD)(PK)***

Dear Judge Kuo:

This firm represents Plaintiff Danielle Buscaino in the above-referenced matter. Pursuant to your Honor's Individual Practice Rules, we write to request an extension of time to file our Response to Defendants' Motion for Summary Judgment filed on August 12, 2024 (ECF #39-#43). Plaintiff's Response is currently due on September 11, 2024. We are requesting a brief extension until September 20, 2024. Defendants consent to this request for an extension. We also ask that Defendants receive an additional ten days, until October 14, 2024, to file their Reply.

This is Plaintiff's first request for an extension of time to file her Response. Thank you for the Court's consideration of this request.

Respectfully Submitted,

/s/ Leah Seliger  
Leah Seliger